

The Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

SOLOWHEEL, INC.,

Plaintiff,

Case No. 3:16-cv-05688-RBL

v.

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES**

NINEBOT INC. (USA), D/B/A NINEBOT
U.S., INC.; NINEBOT (TIANJIN)
TECHNOLOGY CO., LTD.; NINEBOT, INC.
(China),

**NOTE ON MOTION CALENDAR:
August 23, 2018**

Defendant.

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiff Solowheel, Inc. (“Solowheel”) and Defendant Ninebot (Tianjin) Technology Co., Ltd (“Ninebot”) hereby stipulate and jointly move the Court for extensions regarding all remaining deadlines set forth in the Court’s June 28, 2018 Order Granting Stipulation and Joint Motion to Extend Deadlines (D.I. 41). The reason for this Stipulation and [Proposed] Order to Extend Deadlines is that (i) the parties are involved in extensive discussions toward settlement of all pending issues, and believe the additional time requested shall facilitate such resolution, and (ii) the parties desire to ensure consistency and coherence between the dates established in the foregoing orders, to ensure timely completion of

all stages of the case. The proposed extension of deadlines follows the Court's Local and Patent Rules and is as follows:

	Original Date	Proposed Date
Joint Claim Construction	August 27, 2018	September 27, 2018
Claim Construction Expert Disclosures	August 27, 2018	September 27, 2018
Completion of Claim Construction Discovery	September 27, 2018	October 29, 2018
Opening Claim Construction Brief	October 1, 2018	November 1, 2018
Responsive Claim Construction Brief	October 16, 2018	November 16, 2018
Markman hearing at 09:00 AM	<i>To be determined.</i>	<i>To be determined.</i>
Expert Witness Disclosure/Reports under FRCP 26(a)(2)	<i>To be determined.</i>	<i>To be determined.</i>
Rebuttal Expert Disclosure/Reports	<i>To be determined.</i>	<i>To be determined.</i>
Motions	<i>To be determined.</i>	<i>To be determined.</i>
Completion of discovery (fact and expert)	<i>To be determined.</i>	<i>To be determined.</i>
Dispositive motions	<i>To be determined.</i>	<i>To be determined.</i>
Attorney settlement conference	<i>To be determined.</i>	<i>To be determined.</i>
Mediation to be completed	<i>To be determined.</i>	<i>To be determined.</i>
Motions in Limine	<i>To be determined.</i>	<i>To be determined.</i>
Pretrial Order	<i>To be determined.</i>	<i>To be determined.</i>
Trial briefs	<i>To be determined.</i>	<i>To be determined.</i>
Voire dire/jury instructions	<i>To be determined.</i>	<i>To be determined.</i>

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The Parties acknowledge the proposed extension of deadlines may impact later dates, and will adhere to any subsequent resetting of deadlines which the Court deems appropriate. A Proposed Order is below.

Dated: August 23, 2018

Respectfully submitted,

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*Counsel for Defendant
Ninebot (Tianjin) Technology Co., Ltd.*

[PROPOSED] ORDER

Based on the foregoing stipulation of the parties, IT IS SO ORDERED

DATED this ____ day of _____, 2018.

THE HONORABLE RONALD B. LEIGHTON
UNITED STATES DISTRICT JUDGE

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